



Montana Environmental Trust Group, LLC
Trustee of the Montana Environmental Custodial Trust
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By Electronic Mail

December 16, 2016

Betsy Burns
RCRA Project Officer and CERCLA RPM
US Environmental Protection Agency—Region 8
Montana Office
10 West 15th Street, Suite 3200
Helena, Montana 59626

RE: Final 2017 Budget for East Helena Cleanup (EHCU) Account
Montana Environmental Custodial Trust

Dear Betsy:

Pursuant to ¶16.g of the Consent Decree and Settlement Agreement Regarding the Montana Sites (the Settlement Agreement), the Montana Environmental Trust Group, LLC, Trustee of the Montana Environmental Custodial Trust (the Custodial Trust), hereby submits the final East Helena Cleanup (EHCU) Account budget for environmental actions to be performed in 2017 (the Final 2017 Budget). The Final 2017 Budget for the EHCU Account is submitted to the United States Environmental Protection Agency (EPA) as Lead Agency for the East Helena Designated Property.

- Table 1—Summarizes the Final 2017 Budget
- Table 2—Details the Final 2017 Budget (to the Level 5 Cost Center)
- Table 3—Provides an estimate of the projected expenditures for the first quarter of 2018 (pursuant to ¶16.g of the Settlement Agreement)

The Custodial Trust is requesting EPA approval for a 2017 budget of \$3,835,000 and conditional approval of \$225,500 for certain 2017 environmental actions that must be individually approved by EPA pursuant to the EHCU Account budget protocols. Consistent with the budget protocols, the Custodial Trust is accountable to: the Level 1 budget for Cost Centers A through I and K through T; and the Level 3 budget for Cost Center for J.

Thank you for your consideration and approval of the Final 2017 Budget and best wishes for a happy New Year.

Sincerely,

Montana Environmental Trust Group, LLC

Trustee of the Montana Environmental Custodial Trust

By: Greenfield Environmental Trust Group, Inc., Member

By: Cynthia Brooks, President

Attachments

cc: Chuck Figur—EPA
Lauri Gorton—Custodial Trust
Jennifer Roberts—Custodial Trust
Joe Vranka—EPA
Marc Weinreich—Custodial Trust

TABLE 1

Table 1 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCU) Account 2017 Final Budget
2017 Budget Summary (December 16, 2016)

Level 1 Cost Centers		Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget
A	HDS Water Treatment Plant		II.A	\$0	\$0	\$166,300	\$166,300	\$39,448	\$0
B	General Site Operations & Maintenance		II.B	\$0	\$0	\$210,900	\$210,900	\$80,712	\$108,100
C	Waste Disposal		II.C	\$0	\$0	\$13,300	\$13,300	\$1,038	\$6,300
D	Slag Reprocessing		II.D	\$0	\$0	\$11,800	\$11,800	\$0	\$11,800
E	Tenants		II.E	\$0	\$0	\$5,700	\$5,700	\$0	\$5,700
F	RCRA/CAMU Compliance		II.F	\$575,000	\$0	\$76,400	\$76,400	\$15,981	\$566,300
I	Risk Assessments		II.I	\$0	\$0	\$50,000	\$50,000	\$0	\$50,000
J	RCRA Corrective Action Implementation	1. South Plant Hydraulic Control (SPHC) IM							
		a. Design	II.J.1.a	\$0	\$0	\$29,000	\$29,000	\$0	\$289,000
		b. Construction	II.J.1.b	\$12,700,000	\$12,135,000	\$90,000	\$15,000	\$0	\$716,500
		c. O&M	II.J.1.c	\$0	\$0	\$50,000	\$50,000	\$0	\$0
		Subtotal SPHC IM	II.J.1	\$12,700,000	\$12,135,000	\$169,000	\$94,000	\$0	\$1,005,500
		2. ET Cover System IM							
		a. Design	II.J.2.a	\$0	\$0	\$26,750	\$26,750	\$0	\$16,500
		b. Construction	II.J.2.b	\$8,000,000	\$8,000,000	\$0	\$0	\$0	\$16,000
		c. O&M	II.J.2.c	\$0	\$0	\$0	\$0	\$0	\$0
		Subtotal ET Cover System IM	II.J.2	\$8,000,000	\$8,000,000	\$26,750	\$26,750	\$0	\$32,500
		3. Source Removal IM							
		a. Design	II.J.3.a	\$800,000	\$50,000	\$50,000	\$50,000	\$0	\$0
		b. Construction	II.J.3.b	\$3,450,000	\$900,000	\$0	\$0	\$0	\$0
		c. O&M	II.J.3.c	\$0	\$0	\$0	\$0	\$0	\$0
		Subtotal Source Removal IM	II.J.3	\$4,250,000	\$950,000	\$50,000	\$50,000	\$0	\$0
		4. IM/RCRA Support							
		a. IM Work Plan(s)	II.J.4.a	\$0	\$0	\$31,500	\$31,500	\$9,926	\$0
		b. Corrective Measures Study	II.J.4.b	\$0	\$0	\$1,339,700	\$1,339,700	\$411,118	\$130,900
		d. Controlled GW Area (CGWA)	II.J.4.d	\$0	\$0	\$628,000	\$628,000	\$69,548	\$0
		g. Long-term Planning	II.J.4.g	\$0	\$0	\$21,000	\$21,000	\$2,867	\$0
		h. Phase II RFI/Soil Characterization	II.J.4.h	\$0	\$0	\$172,300	\$172,300	\$74,089	\$0
		j. Efforts to Avoid MBTA Non-Compliance	II.J.4.j	\$0	\$0	\$40,000	\$40,000	\$0	\$0
		Subtotal IM/RCRA Support	II.J.4	\$0	\$0	\$2,232,500	\$2,232,500	\$567,548	\$130,900

TABLE 1

**Table 1 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCU) Account 2017 Final Budget
2017 Budget Summary (December 16, 2016)**

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget
J RCRA Corrective Action Implementation	5. Design Management/Execution							
	a. Project Management/IM	II.J.5.a	\$0	\$0	\$340,000	\$340,000	\$176,821	\$0
	b. Schedule	II.J.5.b	\$0	\$0	\$41,700	\$41,700	\$2,725	\$0
	c. Financial Affairs and Management	II.J.5.c	\$0	\$0	\$57,800	\$57,800	\$20,198	\$0
	d. Sub-contracting	II.J.5.d	\$0	\$0	\$21,600	\$21,600	\$2,353	\$0
	f. Direct Expenses	II.J.5.f	\$0	\$0	\$26,000	\$26,000	\$8,843	\$0
	h. Project Insurance Premium	II.J.5.h	\$0	\$0	\$150,000	\$89,000	\$88,539	\$0
	j. IM Operations and Support	II.J.5.j	\$0	\$0	\$93,100	\$93,100	\$42,725	\$0
	Subtotal Design Management/Execution	II.J.5	\$0	\$0	\$730,200	\$669,200	\$342,204	\$0
	6. Corrective Measures Implementation							
	a. CMI Work Plan	II.J.6.a	\$0	\$0	\$0	\$0	\$0	\$150,000
	b. Final Remedy	II.J.6.b	\$0	\$0	\$0	\$0	\$0	\$15,500
	c. Corrective Measures O&M	II.J.6.c	\$0	\$0	\$0	\$0	\$0	\$550,500
	d. 2017 CAMP/Performance Monitoring	II.J.6.d	\$0	\$0	\$0	\$0	\$0	\$415,300
	e. Long term Technical	II.J.6.e	\$0	\$0	\$0	\$0	\$0	\$50,000
	f. Residential Well Abandonment	II.J.6.f	\$0	\$0	\$0	\$0	\$0	\$176,000
	Subtotal CMI	II.J.6	\$0	\$0	\$0	\$0	\$0	\$1,357,300
	Grand Total RCRA Corrective Action Implementation	II.J	\$24,950,000	\$21,085,000	\$3,208,450	\$3,072,450	\$909,752	\$2,526,200
K Documents & Records		II.K	\$0	\$0	\$39,300	\$39,300	\$2,817	\$39,300
M CERCLA Compliance		II.M	\$0	\$0	\$232,600	\$232,600	\$125,235	\$34,400
N Financial Affairs		II.N	\$0	\$0	\$105,000	\$45,000	\$17,703	\$90,000
O Redevelopment		II.O	\$0	\$0	\$15,000	\$15,000	\$0	\$15,000
P Community Relations		II.P	\$0	\$0	\$68,500	\$48,500	\$14,183	\$38,500
R Legal Support		II.R	\$0	\$0	\$112,100	\$112,100	\$33,278	\$56,200
T Trust Project Management		II.T	\$0	\$0	\$890,000	\$890,000	\$309,250	\$512,700
Total Budget - East Helena Cleanup Account:			\$25,525,000	\$21,085,000	\$5,205,350	\$4,989,350	\$1,549,397	\$4,060,500
Total Amounts That Require Prior EPA Approval:			\$25,525,000		\$305,000			\$225,500
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:			\$0		\$4,900,350			\$3,835,000

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCUC) Account - 2017 Final Budget
December 16, 2016

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2015/2016 Actual Costs as of 9/30/16	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget	Comments	
									2017 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.	
A	HDS Water Treatment Plant	1. Water Treatment O&M/Regulatory Compliance	II.A.1	\$0	\$0	\$0	\$166,300	\$166,300	\$39,448	\$0	No costs in 2017 – demolished in 2016. Recommend retiring cost center.
		Subtotal WTP - II.A		\$0	\$0	\$0	\$166,300	\$166,300	\$39,448	\$0	
B	General Site Operations & Maintenance	1. Operations & Maintenance	II.B.1	\$0	\$0	\$0	\$134,500	\$134,500	\$70,143	\$59,500	Reduced funding from 2016, based on reduced activities projected in 2017.
		2. Office Operations	II.B.2	\$0	\$0	\$0	\$13,000	\$13,000	\$1,955	\$5,000	Reduced funding from 2016, based on reduced activities projected in 2017.
		3. Health & Safety	II.B.3	\$0	\$0	\$0	\$33,900	\$33,900	\$2,121	\$14,100	Reduced funding from 2016, based on reduced activities projected in 2017.
		6. Emergency Response	II.B.6	\$0	\$0	\$0	\$20,000	\$20,000	\$0	\$20,000	Level funding from 2016.
		7. Site Office	II.B.7	\$0	\$0	\$0	\$9,500	\$9,500	\$6,493	\$9,500	Level funding from 2016; budget assumes modular office not sold to Chemet in 2017.
		Subtotal Site O&M - II.B		\$0	\$0	\$0	\$210,900	\$210,900	\$80,712	\$108,100	
C	Waste Disposal	1. HDS	II.C.1	\$0	\$0	\$0	\$1,000	\$1,000	\$0	\$0	No costs anticipated. Recommend retiring cost center.
		2. Contaminated Debris	II.C.2	\$0	\$0	\$0	\$6,000	\$6,000	\$0	\$0	No costs anticipated. Recommend retiring cost center.
		3. Other Disposal	II.C.3	\$0	\$0	\$0	\$6,300	\$6,300	\$1,038	\$6,300	Level funding from 2016.
		Subtotal Waste Disposal - II.C		\$0	\$0	\$0	\$13,300	\$13,300	\$1,038	\$6,300	
D	Slag Reprocessing	1. Slag Pile Re-Processing	II.D.1	\$0	\$0	\$0	\$11,800	\$11,800	\$0	\$11,800	Level funding from 2016.
		Subtotal Slag Reprocessing - II.D		\$0	\$0	\$0	\$11,800	\$11,800	\$0	\$11,800	
E	Tenants	4. Other Tenants/Land Use Matters	II.E.4	\$0	\$0	\$0	\$5,700	\$5,700	\$0	\$5,700	Level funding from 2016.
		Subtotal Tenants - II.E		\$0	\$0	\$0	\$5,700	\$5,700	\$0	\$5,700	
F	RCRA/CAMU Compliance	1. Reporting	II.F.1	\$0	\$0	\$0	\$2,000	\$2,000	\$0	\$2,000	Level funding from 2016.
		2. Inspections	II.F.2	\$0	\$0	\$0	\$2,000	\$2,000	\$924	\$2,000	Reduced funding based on 2015 actuals.
		5. CAMU O&M/Leachate Collection & Disposal	II.F.5	\$0	\$0	\$0	\$38,400	\$38,400	\$15,057	\$208,300	Budget includes CAMU #1 and #2: mowing; weed control; vegetation and leak detection; and consultant estimate for leachate pumping, collection and off-site disposal.
		7. CAMU Leachate Design and Construction	II.F.7	\$575,000	\$0	\$0	\$34,000	\$34,000	\$0	\$354,000	Budget based on consultant estimate to design and construct CAMU Leachate collection and transfer station.
		Subtotal RCRA Compliance - II.F		\$575,000	\$0	\$0	\$76,400	\$76,400	\$15,981	\$566,300	
I	Risk Assessments	1. HHRA	II.I.1	\$0	\$0	\$0	\$25,000	\$25,000	\$0	\$25,000	Budget allowance to address potential comments on CMS report regarding risk assessments.
		2. BERA	II.I.2	\$0	\$0	\$0	\$25,000	\$25,000	\$0	\$25,000	Budget allowance to address potential comments on CMS report regarding risk assessments.
		Subtotal Risk Assessments - II.I		\$0	\$0	\$0	\$50,000	\$50,000	\$0	\$50,000	

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCUC) Account - 2017 Final Budget

December 16, 2016											
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2015/2016 Actual Costs as of 9/30/16	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget	Comments	
									2017 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.	
RCRA Corrective Action Implementation	1. South Plant Hydraulic Control (SPHC) IM	II.J.1									
	a. SPHC IM Design	II.J.1.a									
	7. PPC Realignment Permitting	II.J.1.a.7	\$0	\$0	\$0	\$29,000	\$29,000	\$0	\$289,000	Budget based on consultant estimate for S Montana Avenue extension (construction) and costs related to permit close-out.	
	Subtotal SPHC IM Design - II.J.1.a		\$0	\$0	\$0	\$29,000	\$29,000	\$0	\$289,000		
	b. SPHC IM Construction	II.J.1.b									
	5. Easements and Rights-of-Way	II.J.1.b.5	\$0	\$0	\$0	\$15,000	\$15,000	\$0	\$0	Work complete. Recommend retiring cost center.	
	6. Water Delivery - Negotiations	II.J.1.b.6	\$0	\$0	\$0	\$75,000	\$0	\$0	\$0	Budget assume no costs in 2016.	
	9. PPC Realignment Construction	II.J.1.b.9	\$12,700,000	\$12,135,000	\$7,786,974	\$0	\$0	\$0	\$566,500	Budget based on consultant estimate to complete planting, seeding and construction reporting related to PPC Realignment. Includes costs for oversight and project management. Note: Budget estimate is carryover scope from the 2015/2016 budget, additional scope and/or costs are not included. Original budget included in 2015/2016 approved budget, but due to schedule limitations work is not able to be completed until 2017.	
	10. Insurance	II.J.1.b.10	\$0	\$0	\$0	\$0	\$0	\$0	\$150,000	Budget covers estimate for 2017 site-specific insurance premium required for PPC construction. Blue-box must be unlocked and detailed budget approved by EPA prior to incurring cost.	
	Subtotal SPHC IM Construction - II.J.1.b		\$12,700,000	\$12,135,000	\$7,786,974	\$90,000	\$15,000	\$0	\$716,500		
	c. SPHC IM O&M	II.J.1.c									
	1. PPC Bypass O & M	II.J.1.c.1	\$0	\$0	\$0	\$50,000	\$50,000	\$0	\$0	2017 costs moved to Cost Center II.J.6.c.1. Recommend retiring cost center.	
	Subtotal PPC Bypass O&M - II.J.1.c		\$0	\$0	\$0	\$50,000	\$50,000	\$0	\$0		
	Subtotal SPHC IM Design, Construction and O&M - II.J.1		\$12,700,000	\$12,135,000	\$7,786,974	\$169,000	\$94,000	\$0	\$1,005,500		
	2. ET Cover System IM	II.J.2									
	a. ET Cover System IM Design	II.J.2.a									
	4. Stormwater Management/Permitting	II.J.2.a.4	\$0	\$0	\$0	\$11,000	\$11,000	\$0	\$16,500	Budget covers costs to update SWPPP for 2017 activities.	
	9. Source Material Sampling & Analysis	II.J.2.a.9	\$0	\$0	\$0	\$15,750	\$15,750	\$0	\$0	Work completed in 2016. Recommend retiring Cost Center.	
	Subtotal ET Cover System IM Design - II.J.2.a		\$0	\$0	\$0	\$26,750	\$26,750	\$0	\$16,500		
	b. ET Cover System IM Construction	II.J.2.b									
	9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$8,000,000	\$8,000,000	\$7,211,995	\$0	\$0	\$0	\$16,000	Budget based on consultant estimate to complete and finalize all construction documents. Budget also includes limited funds to repair ET Cover after NW Energy removes final power poles in 2017.	
	Subtotal ET Cover System IM Construction - II.J.2.b		\$8,000,000	\$8,000,000	\$7,211,995	\$0	\$0	\$0	\$16,000		
	c. ET Cover System O&M	II.J.2.c									
	1. ET Cover System/ICS O & M	II.J.2.c.1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2017 costs moved to Cost Center II.J.6.c.2. Recommend retiring cost center.	
	Subtotal PPC Bypass O&M - II.J.2.c		\$0	\$0	\$0	\$0	\$0	\$0	\$0		
	Subtotal ET Cover System IM - II.J.2		\$8,000,000	\$8,000,000	\$7,211,995	\$26,750	\$26,750	\$0	\$32,500		
	3. Source Removal/Control IM	II.J.3									
	a. Source Removal/Control IM Design	II.J.3.a									
	3. Source Removal Design	II.J.3.a.3									
	ii. Final	II.J.3.a.3.ii	\$800,000	\$50,000	\$23,896	\$0	\$0	\$0	\$0	Work completed in 2016. Recommend retiring Cost Center.	
	5. Tito Park Permitting	II.J.3.a.5	\$0	\$0	\$0	\$10,000	\$10,000	\$0	\$0	Future work to be performed under Cost Center II.J.6.b.1. Recommend retiring Cost Center.	
	6. Wilson Ditch Remedy	II.J.3.a.6	\$0	\$0	\$0	\$40,000	\$40,000	\$0	\$0	Future work to be performed under Cost Center II.J.6.b.1. Recommend retiring Cost Center.	
	Subtotal Source Removal/Control IM Design - II.J.3.a		\$800,000	\$50,000	\$23,896	\$50,000	\$50,000	\$0	\$0		
	b. Source Removal/Control IM Construction	II.J.3.b									
	2. Wilson Ditch Remediation	II.J.3.b.2	\$350,000	\$0	\$0	\$0	\$0	\$0	\$0	Future work to be performed under Cost Center II.J.6.b.2. Recommend retiring Cost Center.	
	3. Source Removal	II.J.3.b.3	\$3,100,000	\$900,000	\$889,794	\$0	\$0	\$0	\$0	Future work to be performed under Cost Center II.J.6.b.2. Recommend retiring Cost Center.	
	Subtotal Source Removal/Control IM Construction - II.J.3.b		\$3,450,000	\$900,000	\$889,794	\$0	\$0	\$0	\$0		
	c. Source Removal/Control O&M	II.J.3.c									
	1. Tito Park O & M	II.J.3.c.1	\$0	\$0	\$0	\$0	\$0	\$0	\$0	2017 costs moved to Cost Center II.J.6.c.2. Recommend retiring cost center.	
	Subtotal Source Removal/Control O&M - II.J.3.c		\$0	\$0	\$0	\$0	\$0	\$0	\$0		
	Subtotal Source Removal/Control IM Design, Construction and O&M - II.J.3		\$4,250,000	\$950,000	\$913,690	\$50,000	\$50,000	\$0	\$0		

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCU) Account - 2017 Final Budget
December 16, 2016

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2015/2016 Actual Costs as of 9/30/16	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget	Comments
									2017 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.
J	RCRA Corrective Action Implementation	4. IM/RCRA Support	II.J.4							
		a. IM Work Plan(s)	II.J.4.a	\$0	\$0	\$0	\$31,500	\$31,500	\$9,926	\$0 Complete in 2016. Recommend retiring Cost Center.
		b. Corrective Measures Study	II.J.4.b							
		2. Source Area Evaluations/Studies	II.J.4.b.2	\$0	\$0	\$0	\$327,000	\$327,000	\$61,418	\$0 Complete in 2016. Recommend retiring Cost Center.
		3. GW Flow/Contaminant Transport Modeling	II.J.4.b.3	\$0	\$0	\$0	\$183,800	\$183,800	\$14,379	\$0 Complete in 2016. Recommend retiring Cost Center.
		4. Tier II GW Evaluations	II.J.4.b.4	\$0	\$0	\$0	\$60,400	\$60,400	\$29,719	\$0 Complete in 2016. Recommend retiring Cost Center.
		5. Conceptual Site Models	II.J.4.b.5	\$0	\$0	\$0	\$42,300	\$42,300	\$3,054	\$0 Complete in 2016. Recommend retiring Cost Center.
		6. Comprehensive GW Plan and Strategy	II.J.4.b.6	\$0	\$0	\$0	\$47,300	\$47,300	\$3,131	\$0 Complete in 2016. Recommend retiring Cost Center.
		7. 2017 CAMP	II.J.4.b.7							
		i. Analytical Services	II.J.4.b.7.i	\$0	\$0	\$0	\$162,800	\$162,800	\$73,515	\$0 Future work to be performed under Cost Center II.J.6.d.1. Recommend retiring Cost Center.
		ii. Database Management	II.J.4.b.7.ii	\$0	\$0	\$0	\$38,900	\$38,900	\$13,303	\$0 Future work to be performed under Cost Center II.J.6.d.1. Recommend retiring Cost Center.
		iii. Well Integrity Survey and Repairs	II.J.4.b.7.iii	\$0	\$0	\$0	\$37,200	\$37,200	\$23,255	\$0 Future work to be performed under Cost Center II.J.6.d.1. Recommend retiring Cost Center.
		iv. CAMP Implementation & GW/SW Characterization	II.J.4.b.7.iv	\$0	\$0	\$0	\$325,000	\$325,000	\$135,563	\$0 Future work to be performed under Cost Center II.J.6.d.1. Recommend retiring Cost Center.
		v. Planning and Reporting	II.J.4.b.7.v	\$0	\$0	\$0	\$16,800	\$16,800	\$14,168	\$0 Future work to be performed under Cost Center II.J.6.d.1. Recommend retiring Cost Center.
		8. CMS Report Preparation	II.J.4.b.8	\$0	\$0	\$0	\$98,200	\$98,200	\$39,613	\$130,900 Budget based on consultant estimate to finalize draft CMS report and incorporate/respond to beneficiary comments. Includes limited costs for model recalibration.
		d. Controlled GW Area (CGWA)	II.J.4.d	\$0	\$0	\$0	\$628,000	\$628,000	\$69,548	\$0 Future work to be performed under Cost Center II.J.6.d.1 and II.J.6.f. Recommend retiring Cost Center.
		g. Long-term Planning	II.J.4.g	\$0	\$0	\$0	\$21,000	\$21,000	\$2,867	\$0 Future work to be performed under Cost Center II.J.6.d.2. Recommend retiring Cost Center.
		h. Phase II RFI/Soil Characterization (CMS Parcels)	II.J.4.h							
		3. Implementation	II.J.4.h.3	\$0	\$0	\$0	\$172,300	\$172,300	\$74,089	\$0 Work completed in 2016. Recommend retiring Cost Center.
		j. Efforts to Avoid MBTA Non-Compliance	II.J.4.j	\$0	\$0	\$0	\$40,000	\$40,000	\$0	\$0 Work completed in 2016. Recommend retiring Cost Center.
		Subtotal IM/RCRA Support - II.J.4		\$0	\$0	\$0	\$2,232,500	\$2,232,500	\$567,548	\$130,900
		5. Design Management/Execution	II.J.5							
		a. Project Management/IM Development	II.J.5.a	\$0	\$0	\$0	\$340,000	\$340,000	\$176,821	\$0 Work completed in 2016. Recommend retiring Cost Center.
		b. Schedule	II.J.5.b	\$0	\$0	\$0	\$41,700	\$41,700	\$2,725	\$0 Work completed in 2016. Recommend retiring Cost Center.
		c. Financial Affairs and Management Reports	II.J.5.c	\$0	\$0	\$0	\$57,800	\$57,800	\$20,198	\$0 Work completed in 2016. Recommend retiring Cost Center.
		d. Sub-contracting	II.J.5.d	\$0	\$0	\$0	\$21,600	\$21,600	\$2,353	\$0 Work completed in 2016. Recommend retiring Cost Center.
		f. Direct Expenses	II.J.5.f	\$0	\$0	\$0	\$26,000	\$26,000	\$8,843	\$0 Work completed in 2016. Recommend retiring Cost Center.
		h. Project Insurance Premium	II.J.5.h	\$0	\$0	\$0	\$150,000	\$89,000	\$88,539	\$0 Future costs included in Cost Center II.J.1.b.10. Recommend retiring Cost Center.
		j. IM Operations and Support	II.J.5.j	\$0	\$0	\$0	\$93,100	\$93,100	\$42,725	\$0 Work completed in 2016. Recommend retiring Cost Center.
		Subtotal Design Management/Execution - II.J.5		\$0	\$0	\$0	\$730,200	\$669,200	\$342,204	\$0

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCU) Account - 2017 Final Budget
December 16, 2016

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2015/2016 Actual Costs as of 9/30/16	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget	Comments
									2017 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.
J	6. Corrective Measure Implementation	II.J.6								
	a. CMI Work Plan	II.J.6.a	\$0	\$0	\$0	\$0	\$0	\$0	\$150,000	Budget covers preparation of Corrective Measures Implementation (CMI) Work Plan, in accordance with Sections VI.10.d and VI.41 of the First Modification to the RCRA Consent Decree, including outline of CM design, construction, implementation schedule and preparation of long-term O&M and monitoring plan for final CMs to be selected by EPA based on the CMS Report. Budget assumes EPA will approve CMS report by 9/30/17.
	b. Final Remedy Construction/Implementation	II.J.6.b								
	1. Design	II.J.6.b.1	\$0	\$0	\$0	\$0	\$0	\$0	\$15,500	Budget based on consultant estimate to begin design of slag pile remedy.
	2. Construction/Implementation	II.J.6.b.2	\$0	\$0	\$0	\$0	\$0	\$0	\$0	No costs expected in 2017. Placeholder cost center.
	Subtotal Final Remedy Construction - II.J.6.b		\$0	\$0	\$0	\$0	\$0	\$0	\$15,500	
	c. Corrective Measures O&M	II.J.6.c								
	1. PPC/PPC Bypass O & M	II.J.6.c.1	\$0	\$0	\$0	\$0	\$0	\$0	\$257,500	Budget includes consultant estimates for: repairs to stream from spring run-off; stream and vegetation assessment; weed and animal browsing control; reseeding and replanting; O&M manual preparation; and monthly inspections. Note: O&M costs for part of the year are included in cost center II.J.1.b.9 (PPC Realignment Construction). Previous years charges in Cost Center II.J.1.c.1; 2016 budget - \$50,000; 2016 YTD Costs - \$0.
	2. ET Cover System/ICS O & M	II.J.6.c.2	\$0	\$0	\$0	\$0	\$0	\$0	\$162,800	Budget includes consultant estimates for: monthly inspections; semi-annual technical inspections; special inspections after extreme events; repairs; management and reporting; and to provide miscellaneous support to O&M Plan setup, training, and execution. Previous years charges in Cost Center II.J.2.c.1; 2016 budget - \$0.
	3. Speiss-Dross Slurry Wall O&M	II.J.6.c.3	\$0	\$0	\$0	\$0	\$0	\$0	\$60,700	Budget includes consultant estimates for: completion of 3 additional wells and full scale reagent addition program.
	4. East Valley Controlled Groundwater Area (EVCWA)	II.J.6.c.4	\$0	\$0	\$0				\$69,500	Budget includes costs for: assisting with technical, regulatory and logistical planning for and implementation of a Controlled Groundwater Area. Previous years charges in Cost Center II.J.4.d; 2016 budget - \$188,000; 2016 YTD Costs - \$5,548.
	Subtotal Corrective Measures O&M - II.J.6.c		\$0	\$0	\$0	\$0	\$0	\$0	\$550,500	
	d. 2017 CAMP/Performance Monitoring	II.J.6.d								
	1. 2017 CAMP	II.J.6.d.1	\$0	\$0	\$0	\$0	\$0	\$0	\$312,800	Budget includes contractor estimates for: sampling and data collection; ongoing data review/analysis; evaluation and distribution of groundwater/surface water quality data; ongoing updates to trending data for monitoring wells; CAMP laboratory analysis; database management activities; and well survey and repairs. Previous years charges in Cost Center II.J.4.b.7; 2016 budget - \$580,700; 2016 YTD Costs - \$259,804.
	2. GW Strategy and Technical Support	II.J.6.d.2	\$0	\$0	\$0	\$0	\$0	\$0	\$102,500	Budget includes contractor estimate for ongoing GW monitoring, data evaluation and reporting. Budget includes limited costs for groundwater modeling.
	Subtotal CAMP/Performance Monitoring - II.J.6.d		\$0	\$0	\$0	\$0	\$0	\$0	\$415,300	
	e. Long term Technical Planning/Support	II.J.6.e	\$0	\$0	\$0	\$0	\$0	\$0	\$50,000	Budget includes costs for support with CMIs, financial forecasting and other technical tasks. Previous years charges in Cost Center II.J.4.g; 2016 budget - \$21,000; 2016 YTD Costs - \$2,867.
	f. Residential Well Abandonment	II.J.6.f	\$0	\$0	\$0	\$0	\$0	\$0	\$176,000	Budget includes costs to abandon 8 private wells in East Helena. Previous years charges in Cost Center II.J.4.d; 2016 budget - \$440,000; 2016 YTD Costs - \$64,000.
	Subtotal Corrective Measures Implementation - II.J.6		\$0	\$0	\$0	\$0	\$0	\$0	\$1,357,300	
	Total All RCRA Corrective Action Implementation Design & Construction - II.J		\$24,950,000	\$21,085,000	\$15,912,659	\$3,208,450	\$3,072,450	\$909,752	\$2,526,200	

Table 2 - Montana Environmental Custodial Trust East Helena Clean-Up (EHCUC) Account - 2017 Final Budget
December 16, 2016

Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2015/2016 Original Budget	2015/2016 EPA Approved Budget as of 10/15/2016	2015/2016 Actual Costs as of 9/30/16	2016 Original Budget	2016 EPA Approved Budget as of 10/15/2016	2016 Actual Costs as of 9/30/2016	2017 Final Budget	Comments
									2017 Budget Line Items Requiring Prior EPA Approval	Budget line items highlighted in blue have not been fully scoped, costed and/or financially committed by the Custodial Trust. Prior to incurring any charges or making contractual commitments in connection with these activities, the Custodial Trust will secure the prior written approval of EPA.
K Documents & Records	1. System Set-up	II.K.1	\$0	\$0	\$0	\$21,300	\$21,300	\$0	\$21,300	Budget covers costs to complete set up of on-line document system (VDR) (Alfresco), including on-going compilation of documents, converting to OCR, indexing and filing. Budget proposes to transfer funds from 2016 to 2017.
	3. System Maintenance	II.K.3	\$0	\$0	\$0	\$18,000	\$18,000	\$2,817	\$18,000	Budget covers estimated costs to maintain Alfresco system. Level funded from 2016.
	Subtotal Documents & Records - II.K		\$0	\$0	\$0	\$39,300	\$39,300	\$2,817	\$39,300	
M CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$0	\$0	\$0	\$232,600	\$232,600	\$125,235	\$34,400	Budget includes costs for: East Fields soil repository erosion control measures; management and maintenance of mini-soil repository; and weed control.
	Subtotal CERCLA Compliance - II.M		\$0	\$0	\$0	\$232,600	\$232,600	\$125,235	\$34,400	
N Financial Affairs	1. CPA Services	II.N.1	\$0	\$0	\$0	\$45,000	\$45,000	\$17,703	\$30,000	2017 budget reduced based on projected LOE in 2017.
	2. Design and Construction Audit Service	II.N.4	\$0	\$0	\$0	\$60,000	\$0	\$0	\$60,000	Budget based on estimated cost for audit of engineering design/construction contractor. Note: Cost for beneficiary-requested audit per Section 6.1 of Trust Agreement covered by Administrative Account Budget.
	Subtotal Financial Affairs - II.N		\$0	\$0	\$0	\$105,000	\$45,000	\$17,703	\$90,000	
O Redevelopment	1. Redevelopment Plans	II.O.1	\$0	\$0	\$0	\$5,000	\$5,000	\$0	\$0	Budget assumes no activity in 2017. Recommend retiring cost center.
	2. Redevelopment Technical Support	II.O.2	\$0	\$0	\$0	\$5,000	\$5,000	\$0	\$10,000	Budget assumes limited technical planning support for 2017.
	3. Redevelopment Issues	II.O.3	\$0	\$0	\$0	\$5,000	\$5,000	\$0	\$5,000	Budget assumes limited technical/logistical support to address redevelopment issues and local land use regulations.
	Subtotal Redevelopment - II.O		\$0	\$0	\$0	\$15,000	\$15,000	\$0	\$15,000	
P Community Relations	1. General Meetings	II.P.1	\$0	\$0	\$0	\$3,000	\$3,000	\$0	\$3,000	Level funded from 2016.
	2. RCRA Annual Public Meeting	II.P.2	\$0	\$0	\$0	\$3,000	\$3,000	\$1,478	\$3,000	Level funded from 2016.
	3. East Helena Website	II.P.3	\$0	\$0	\$0	\$7,500	\$7,500	\$5,705	\$7,500	Level funded from 2016.
	4. Community Involvement/Relations Plan	II.P.4	\$0	\$0	\$0	\$20,000	\$0	\$0	\$0	No costs anticipated in 2017.
	5. Other CR activities	II.P.5	\$0	\$0	\$0	\$35,000	\$35,000	\$7,000	\$25,000	Budget includes costs for: periodic fact sheets, newsletters and updates on project status; logistical and other support for community tours and meetings; updates to PPC video; routine aerial photography.
	Subtotal Community Relations - II.P		\$0	\$0	\$0	\$68,500	\$48,500	\$14,183	\$38,500	
R Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$0	\$0	\$0	\$30,000	\$30,000	\$2,609	\$15,000	Reduced funding based on 2016 actuals.
	2. In-house Legal Services	II.R.2	\$0	\$0	\$0	\$82,100	\$82,100	\$30,669	\$41,200	Reduced funding based on 2016 actuals.
	Subtotal Legal Support - II.R		\$0	\$0	\$0	\$112,100	\$112,100	\$33,278	\$56,200	
T Trust Project Management	4. GW and PPC Project Management	II.T.4	\$0	\$0	\$0	\$81,900	\$81,900	\$41,193	\$56,000	Budget assumes 0.25 FTE in 2017 (compared to 0.35 FTE in 2016).
	6. Compliance Manager	II.T.6	\$0	\$0	\$0	\$56,100	\$56,100	\$11,173	\$13,700	Budget assumes 0.05 FTE in 2017 (compared to 0.25 FTE in 2016).
	7. Operations Manager	II.T.7	\$0	\$0	\$0	\$98,600	\$98,600	\$74,833	\$41,100	Budget assumes 0.25 FTE in 2017 (compared to 0.60 FTE in 2016).
	8. Operations Support Specialist	II.T.8	\$0	\$0	\$0	\$36,000	\$36,000	\$11,941	\$27,000	Budget assumes 0.20 FTE in 2017 (compared to 0.30 FTE in 2016).
	9. Project Controls/Financial Affairs Coordinator	II.T.9	\$0	\$0	\$0	\$153,900	\$153,900	\$42,157	\$115,400	Budget assumes 0.35 FTE in 2017 (compared to 0.50 FTE 2016).
	11. Trustee Management EH Clean Up	II.T.11	\$0	\$0	\$0	\$379,400	\$379,400	\$112,152	\$218,000	Budget assumes: 0.30 FTE (compared to 0.40 FTE in 2016) in 2017 for managing principal and 0.20 FTE for RCRA Director (compared to 0.45 FTE in 2016)
	12. Trustee Land Use & Re-use	II.T.12	\$0	\$0	\$0	\$49,100	\$49,100	\$9,381	\$29,500	Budget assumes 0.05 FTE in 2017 (compared to 0.15 FTE in 2016).
	13. Trustee Travel and Directs	II.T.13	\$0	\$0	\$0	\$35,000	\$35,000	\$6,420	\$12,000	Reduced funding from 2016, assumes less travel in 2017.
	Subtotal Trustee Management - II.T		\$0	\$0	\$0	\$890,000	\$890,000	\$309,250	\$512,700	
Total Budget - East Helena Cleanup Account:			\$25,525,000	\$21,085,000	\$15,912,659	\$5,205,350	\$4,989,350	\$1,549,397	\$4,060,500	
Total Amounts That Require Prior EPA Approval:			\$25,525,000			\$305,000			\$225,500	
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:			\$0			\$4,900,350			\$3,835,000	

TABLE 3

Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2018 Estimate					
December 16, 2016					
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2017 Final Budget	First Quarter 2018 Estimate	
			2017 Budget Line Items Requiring Prior EPA Approval	2017 Budget Line Items Requiring Prior EPA Approval	
A	HDS Water Treatment Plant	1. Water Treatment O&M/Regulatory Compliance	II.A.1	\$0	\$0
		Subtotal WTP - II.A	\$0	\$0	
B	General Site Operations & Maintenance	1. Operations & Maintenance	II.B.1	\$59,500	\$14,875
		2. Office Operations	II.B.2	\$5,000	\$1,250
		3. Health & Safety	II.B.3	\$14,100	\$3,525
		6. Emergency Response	II.B.6	\$20,000	\$5,000
		7. Site Office	II.B.7	\$9,500	\$2,375
		Subtotal Site O&M - II.B	\$108,100	\$27,025	
C	Waste Disposal	1. HDS	II.C.1	\$0	\$0
		2. Contaminated Debris	II.C.2	\$0	\$0
		3. Other Disposal	II.C.3	\$6,300	\$1,575
		Subtotal Waste Disposal - II.C	\$6,300		
D	Slag Reprocessing	1. Slag Pile Re-Processing	II.D.1	\$11,800	\$2,950
		Subtotal Slag Reprocessing - II.D	\$11,800	\$2,950	
E	Tenants	4. Other Tenants/Land Use Matters	II.E.4	\$5,700	\$1,425
		Subtotal Tenants - II.E	\$5,700	\$1,425	
F	RCRA/CAMU Compliance	1. Reporting	II.F.1	\$2,000	\$500
		2. Inspections	II.F.2	\$2,000	\$500
		5. CAMU O&M/Leachate Collection & Disposal	II.F.5	\$208,300	\$52,075
		7. CAMU Leachate Design and Construction	II.F.7	\$354,000	\$0
		Subtotal RCRA Compliance - II.F	\$566,300	\$53,075	
I	Risk Assessments	1. HHRA	II.I.1	\$25,000	\$0
		2. BERA	II.I.2	\$25,000	\$0
		Subtotal Risk Assessments - II.I	\$50,000	\$0	
J	RCRA Corrective Action Implementation	1. South Plant Hydraulic Control (SPHC) IM	II.J.1		
		a. SPHC IM Design	II.J.1.a		
		7. PPC Realignment Permitting	II.J.1.a.7	\$289,000	\$0
		Subtotal SPHC IM Design - II.J.1.a	\$289,000	\$0	
		b. SPHC IM Construction	II.J.1.b		
		5. Easements and Rights-of-Way	II.J.1.b.5	\$0	\$0
		6. Water Delivery - Negotiations	II.J.1.b.6	\$0	\$0
		9. PPC Realignment Construction	II.J.1.b.9	\$566,500	\$141,625
		10. Insurance	II.J.1.b.10	\$150,000	\$0
		Subtotal SPHC IM Construction - II.J.1.b	\$716,500	\$141,625	
		c. SPHC IM O&M	II.J.1.c		
		1. PPC Bypass O & M	II.J.1.c.1	\$0	\$0
		Subtotal PPC Bypass O&M - II.J.1.c	\$0	\$0	
		Subtotal SPHC IM Design, Construction and O&M - II.J.1	\$1,005,500	\$141,625	
		2. ET Cover System IM	II.J.2		
		a. ET Cover System IM Design	II.J.2.a		
		4. Stormwater Management/Permitting	II.J.2.a.4	\$16,500	\$0
		9. Source Material Sampling & Analysis	II.J.2.a.9	\$0	\$0
		Subtotal ET Cover System IM Design - II.J.2.a	\$16,500	\$0	
		b. ET Cover System IM Construction	II.J.2.b		
		9. ET Cover, ICS 2 and Phase 3 Demo Construction	II.J.2.b.9	\$16,000	\$0
		Subtotal ET Cover System IM Construction - II.J.2.b	\$16,000	\$0	
		c. ET Cover System O&M	II.J.2.c		
		1. ET Cover System/ICS O & M	II.J.2.c.1	\$0	\$0
		Subtotal PPC Bypass O&M - II.J.2.c	\$0	\$0	
		Subtotal ET Cover System IM - II.J.2	\$32,500	\$0	
		3. Source Removal/Control IM	II.J.3		
		a. Source Removal/Control IM Design	II.J.3.a		
		3. Source Removal Design	II.J.3.a.3		
		ii. Final	II.J.3.a.3.ii	\$0	\$0
		5. Tito Park Permitting	II.J.3.a.5	\$0	\$0
		6. Wilson Ditch Remedy	II.J.3.a.6	\$0	\$0
		Subtotal Source Removal/Control IM Design - II.J.3.a	\$0	\$0	
		b. Source Removal/Control IM Construction	II.J.3.b		
		2. Wilson Ditch Remediation	II.J.3.b.2	\$0	\$0
		3. Source Removal	II.J.3.b.3	\$0	\$0
		Subtotal Source Removal/Control IM Construction - II.J.3.b	\$0	\$0	
		c. Source Removal/Control O&M	II.J.3.c		
		1. Tito Park O & M	II.J.3.c.1	\$0	\$0
		Subtotal Source Removal/Control O&M - II.J.3.c	\$0	\$0	
		Subtotal Source Removal/Control IM Design, Construction and O&M - II.J.3	\$0	\$0	

Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2018 Estimate				
December 16, 2016				
Level 1 Cost Centers	Level 2 Cost Centers	Cost Code	2017 Final Budget	First Quarter 2018 Estimate
			2017 Budget Line Items Requiring Prior EPA Approval	2017 Budget Line Items Requiring Prior EPA Approval
J	RCRA Corrective Action Implementation	4. IM/RCRA Support	II.J.4	
		a. IM Work Plan(s)	II.J.4.a	\$0
		b. Corrective Measures Study	II.J.4.b	
		2. Source Area Evaluations/Studies	II.J.4.b.2	\$0
		3. GW Flow/Contaminant Transport Modeling	II.J.4.b.3	\$0
		4. Tier II GW Evaluations	II.J.4.b.4	\$0
		5. Conceptual Site Models	II.J.4.b.5	\$0
		6. Comprehensive GW Plan and Strategy	II.J.4.b.6	\$0
		7. 2017 CAMP	II.J.4.b.7	
		i. Analytical Services	II.J.4.b.7.i	\$0
		ii. Database Management	II.J.4.b.7.ii	\$0
		iii. Well Integrity Survey and Repairs	II.J.4.b.7.iii	\$0
		iv. CAMP Implementation & GW/SW Characterization	II.J.4.b.7.iv	\$0
		v. Planning and Reporting	II.J.4.b.7.v	\$0
		8. CMS Report Preparation	II.J.4.b.8	\$130,900
		d. Controlled GW Area (CGWA)	II.J.4.d	\$0
		g. Long-term Planning	II.J.4.g	\$0
		h. Phase II RFI/Soil Characterization (CMS Parcels)	II.J.4.h	
		3. Implementation	II.J.4.h.3	\$0
		j. Efforts to Avoid MBTA Non-Compliance	II.J.4.j	\$0
		Subtotal IM/RCRA Support - II.J.4	\$130,900	\$0
		5. Design Management/Execution	II.J.5	
		a. Project Management/IM Development	II.J.5.a	\$0
		b. Schedule	II.J.5.b	\$0
		c. Financial Affairs and Management Reports	II.J.5.c	\$0
		d. Sub-contracting	II.J.5.d	\$0
		f. Direct Expenses	II.J.5.f	\$0
		h. Project Insurance Premium	II.J.5.h	\$0
		j. IM Operations and Support	II.J.5.j	\$0
		Subtotal Design Management/Execution - II.J.5	\$0	\$0
	RCRA Corrective Action Implementation	6. Corrective Measure Implementation	II.J.6	
		a. CMI Work Plan	II.J.6.a	\$150,000
		b. Final Remedy Construction/Implementation	II.J.6.b	
		1. Design	II.J.6.b.1	\$15,500
		2. Construction/Implementation	II.J.6.b.2	\$0
		Subtotal Final Remedy Construction - II.J.6.b	\$15,500	\$2,100,000
		c. Corrective Measures O&M	II.J.6.c	
		1. PPC/PPC Bypass O & M	II.J.6.c.1	\$257,500
		2. ET Cover System/ICS O & M	II.J.6.c.2	\$162,800
		3. Speiss-Dross Slurry Wall O&M	II.J.6.c.3	\$60,700
		4. East Valley Controlled Groundwater Area (EVCWA)	II.J.6.c.4	\$69,500
		Subtotal Corrective Measures O&M - II.J.6.c	\$550,500	\$122,450
		d. 2017 CAMP/Performance Monitoring	II.J.6.d	
		1. 2017 CAMP	II.J.6.d.1	\$312,800
		2. GW Strategy and Technical Support	II.J.6.d.2	\$102,500
		Subtotal CAMP/Performance Monitoring - II.J.6.d	\$415,300	\$103,825
		e. Long term Technical Planning/Support	II.J.6.e	\$50,000
		f. Residential Well Abandonment	II.J.6.f	\$176,000
		Subtotal Corrective Measures Implementation - II.J.6	\$1,357,300	\$2,382,775
		Total All RCRA Corrective Action Implementation Design & Construction - II.J	\$2,526,200	\$2,524,400

Table 3 - Montana Environmental Custodial Trust East Helena Clean-Up Account - 1Q2018 Estimate					
December 16, 2016					
Level 1 Cost Centers		Level 2 Cost Centers	Cost Code	2017 Final Budget	First Quarter 2018 Estimate
				2017 Budget Line Items Requiring Prior EPA Approval	2017 Budget Line Items Requiring Prior EPA Approval
K	Documents & Records	1. System Set-up	II.K.1	\$21,300	\$5,325
		3. System Maintenance	II.K.3	\$18,000	\$4,500
		Subtotal Documents & Records - II.K		\$39,300	\$9,825
M	CERCLA Compliance	1. CERCLA/ROD Compliance	II.M.X	\$34,400	\$8,600
		Subtotal CERCLA Compliance - II.M		\$34,400	\$8,600
N	Financial Affairs	1. CPA Services	II.N.1	\$30,000	\$7,500
		2. Design and Construction Audit Service	II.N.4	\$60,000	\$15,000
		Subtotal Financial Affairs - II.N		\$90,000	\$22,500
O	Redevelopment	1. Redevelopment Plans	II.O.1	\$0	\$0
		2. Redevelopment Technical Support	II.O.2	\$10,000	\$0
		3. Redevelopment Issues	II.O.3	\$5,000	\$1,250
		Subtotal Redevelopment - II.O		\$15,000	\$1,250
P	Community Relations	1. General Meetings	II.P.1	\$3,000	\$750
		2. RCRA Annual Public Meeting	II.P.2	\$3,000	\$750
		3. East Helena Website	II.P.3	\$7,500	\$1,875
		4. Community Involvement/Relations Plan	II.P.4	\$0	\$0
		5. Other CR activities	II.P.5	\$25,000	\$6,250
		Subtotal Community Relations - II.P		\$38,500	\$9,625
R	Legal Support	1. Outside Council Fees & Expenses	II.R.1	\$15,000	\$3,750
		2. In-house Legal Services	II.R.2	\$41,200	\$10,300
		Subtotal Legal Support - II.R		\$56,200	\$14,050
T	Trust Project Management	4. GW and PPC Project Management	II.T.4	\$56,000	\$14,000
		6. Compliance Manager	II.T.6	\$13,700	\$3,425
		7. Operations Manager	II.T.7	\$41,100	\$10,275
		8. Operations Support Specialist	II.T.8	\$27,000	\$6,750
		9. Project Controls/Financial Affairs Coordinator	II.T.9	\$115,400	\$28,850
		11. Trustee Management EH Clean Up	II.T.11	\$218,000	\$54,500
		12. Trustee Land Use & Re-use	II.T.12	\$29,500	\$7,375
		13. Trustee Travel and Directs	II.T.13	\$12,000	\$3,000
		Subtotal Trustee Management - II.T		\$512,700	\$128,175
Total Budget - East Helena Cleanup Account:				\$4,060,500	\$2,802,900
Total Amounts That Require Prior EPA Approval:				\$225,500	\$115,000
Final Budget East Helena Cleanup Account Excluding Amounts That Require Prior EPA Approval:				\$3,835,000	\$2,687,900